

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

IN RE: REQUEST FOR INTERNATIONAL	)	
JUDICIAL ASSISTANCE FROM THE 10TH	)	
FAMILY COURT OF ANADOLU IN	)	Case No. 1:24-mc-19
ISTANBUL, REPUBLIC TÜRKIYE IN THE	)	
MATTER OF <i>AHMED M. BEDIER</i> v.	)	
<i>ASLIHAN BEDIER</i> .	)	
_____	)	

**DECLARATION OF ASSISTANT UNITED STATES ATTORNEY  
MATTHEW J. MEZGER**

I, Matthew J. Mezger, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an Assistant United States Attorney in the Office of the United States Attorney for the Eastern District of Virginia, counsel for the United States of America. I make this declaration upon information and belief based upon the attached exhibits and communications with personnel in the United States Department of Justice, to which a Letter of Request has been transmitted for execution. I make this declaration in support of the Government's request, pursuant to 28 U.S.C. § 1782(a), for an Order appointing me Commissioner for the purpose of obtaining testimony from Mongi Dhaouadi.<sup>1</sup>

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<sup>1</sup> Section 1782(a) provides, in pertinent part, as follows:

The district court of the district in which a person resides or is found may order him to give his testimony or statement or to produce a document or other thing for use in a proceeding in a foreign or international tribunal, including criminal investigations conducted before formal accusation. The order may be made pursuant to a letter rogatory issued, or request made, by a foreign or international tribunal or upon the application of any interested person and may direct that the testimony or statement be given, or the document or other thing be produced, before a person appointed by the court. By virtue of his appointment, the person appointed has power to administer any necessary oath and take the testimony or statement. The order may prescribe the practice and procedure, which may be in whole or part the practice and procedure of the foreign country or the international tribunal, for taking the testimony or statement or producing the document or other thing. To the extent that the order does not prescribe otherwise, the testimony or statement shall be taken, and the document or other thing produced, in accordance with the

2. In connection with a judicial proceeding in the 10th Family Court of Anadolu in Istanbul, Republic of Türkiye (“Turkish Court”), captioned *Ahmed M. Bedier v. Aslihan Bedier*, Foreign Reference Number 2022/480, the Judge issued a Letter of Request seeking testimony from Mongi Dhaouadi. True and correct copies of correspondence received from the Department of Justice (“DOJ”) and the attached Letter of Request are attached as Exhibits 1-2, respectively.

3. The specific information requested by the Turkish Court is reflected in a subpoena addressed to Mongi Dhaouadi, which the United States of America intends to serve (in substantially similar format) upon my appointment as Commissioner. A copy of the proposed subpoena is attached as Exhibit 3.

4. To date, the witness has received multiple emails and has accepted a Federal Express package to his residence but has not responded to the requests from the Department of Justice. *See* Exhibits 4-7.

5. To assist the Turkish Court in obtaining the requested information, I respectfully request that this Court enter the proposed Order attached to the Application appointing me Commissioner.

No previous Application for the relief sought herein has been made. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, the United States respectfully requests that this Court enter the attached Order.

[signature page follows]

ALEXANDRIA, VA

July 10, 2024

 Digitally signed by MATTHEW  
MEZGER  
Date: 2024.07.10 11:11:06 -04'00'

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MATTHEW J. MEZGER  
ASSISTANT UNITED STATES ATTORNEY